



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

WAD 6819
02/04/05
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04 FEB 2005

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Reply to
Attn Of: AWT-121

Mr. William D. Ernst
Company Energy & Environmental Affairs
The Boeing Company
P.O. Box 3707
MC 1W-12
Seattle, WA 98124-2207

**Re: Approval of Phase II Transformer PCB Investigation Work Plan
Boeing Plant 2, Seattle/Tukwila, Washington
EPA ID No. WAD 00925 6819
Administrative Order on Consent RCRA Docket No. 1092-01-22-3008(h)**

Dear Mr. Ernst:

The U.S. Environmental Protection Agency, Region 10 (EPA) has reviewed the revised *Phase II Transformer PCB Investigation Work Plan* (Work Plan) submitted by The Boeing Company (Boeing) to EPA on November 30, 2004. For the most part, Boeing has adequately addressed EPA's previous comments on this document. Pursuant to Section 10.1 of the above-referenced Administrative Order on Consent, EPA approves the Work Plan with the following modifications.

1. Work Plan Table 4.1 and Appendix A, QAPP Table 2.2, Technical Holding Time

The holding time of 14 days for preserved samples for analysis of TPH-Dx water samples is modified to 7 days.

Reason: The holding time is 7 days for extraction/40 days for analysis for TPH-Dx water samples, regardless of adding HCl.

2. Work Plan, Section 4.5

The qualifier list is reduced to just validation qualifiers.

Reason: Some of the qualifiers listed as data validation qualifiers are lab qualifiers. Specifically, NJ, B, MG, MP, and NY qualifiers are lab qualifiers. It is the responsibility of Boeing's quality assurance personnel to determine if lab qualifiers should be removed from the data or replaced with validation qualifiers.

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3. Appendix A, QAPP, Table 2-1

A footnote is added showing the allocation of samples among the events.

Reason: It is difficult for EPA to understand how totals are derived for soils listed in the "Total Field Samples/Containers" and "Total Field and QA/QC Analyses/Containers" columns.

Field work is to commence within 10 days of this approval, in accordance with the Schedule listed in Section 7.0 of the Work Plan.

If you have any questions regarding this approval, please don't hesitate to call me at (206) 553-2851 or you may email me at orlean.howard@epa.gov.

Sincerely,



Howard Orlean
Project Manager

cc: Hideo Fujita, Ecology-NWRO
Brad Helland, Ecology NWRO